

**O'BRIEN, BELLAND & BUSHINSKY, LLC**

1526 Berlin Road

Cherry Hill, New Jersey 08003

856-795-2181/Fax: 856-795-2182

By: Steven J. Bushinsky, Esquire

Mark E. Belland, Esquire

*Attorneys for Defendant, International Union of Painters and Allied Trades District Council No. 711 Health & Welfare Fund*

---

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

---

NORTH JERSEY SURGERY  
CENTER a/s/o ROSEANN  
DAWSON,

Plaintiffs,

v.

HORIZON BLUE CROSS BLUE  
SHIELD OF NEW JERSEY;  
PAINTERS DISTRICT COUNCIL  
NO. 711 WELFARE FUND; ABC  
CORP. (1-10) (Said names being  
fictitious and unknown entities).

Defendants.

Civil Action No:12-cv-06787(DMC)(JAD)

**STIPULATION VACATING  
DEFAULT AS TO DEFENDANT  
INTERNATIONAL UNION OF  
PAINTERS AND ALLIED TRADES  
DISTRICT COUNSEL NO. 711  
HEALTH & WELFARE FUND**

---

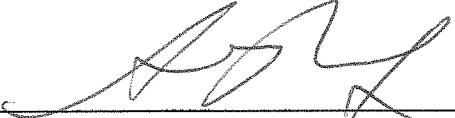
This matter having been opened to the Court by Steven J. Bushinsky,  
Esquire, counsel for Defendant International Union of Painters and Allied Trades  
District Council No. 711 Health & Welfare Fund, and by Andrew R. Bronsnick,  
Esquire, Counsel for Plaintiff who stipulate, subject to the approval of the Court to

vacate the Default entered on October 8, 2013. Plaintiff consents to the withdrawal of their Application for Entry of Default filed on October 7, 2013.

**FURTHERMORE**, Defendant's Answer was filed with the Court on October 10, 2013.

**MASSOOD & BRONSNICK, LLC**

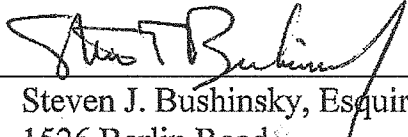
*Attorney for Plaintiff*

By:   
Andrew R. Bronsnick, Esquire  
50 Packanack Lake Road East  
Wayne, NJ 07470-6663  
973-696-1900

Dated: 10/31/13

**O'Brien, Belland & Bushinsky, LLC**

*Attorneys for Co-Defendant,  
International Union of Painters and  
Allied Trades District Council No. 711  
Health & Welfare Fund*

By:   
Steven J. Bushinsky, Esquire  
1526 Berlin Road  
Cherry Hill, New Jersey 08003  
856-795-2181  
Fax 856-795-2182  
[sbushinsky@obbblaw.com](mailto:sbushinsky@obbblaw.com)

Dated: October 18, 2013

---

James B. Clark, III, USMJ